IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF MARYLAND at Baltimore

CONSENT MOTION PURSUANT TO LOCAL BANKRUPTCY RULE 5071-1(d) TO EXTEND DEADLINES AS CONDITION FOR POSTPONEMENT OF BANKRUPTCY RULE SECTION 341 MEETING OF CREDITORS

The above-captioned Debtor(s) has requested a postponement of the Bankruptcy Code Section 341 Meeting of Creditors in accordance with Local Bankruptcy Rule 5071-1(d).

As required by Bankruptcy Rule 5071-1(d)(3)(B), this Court is hereby requested to extend deadlines as follows:

- (i) the right of any party to object to a discharge as provided by Section 727(c)(1) of the Bankruptcy Code, and the right to file a complaint to determine the dischargeability of a debt under Section 523(c) of the Bankruptcy Code, until December 31, 2025;
- (ii) the right of any party to file a motion to dismiss the bankruptcy case pursuant to Section 707(b)(3) of the Bankruptcy Code until December 31, 2025;
- (iii) the right of the Office of the United States Trustee to file a Statement of Presumed Abuse under Section 704(b)(1)(A) of the Bankruptcy Code until ten (10) days after the conclusion of the rescheduled meeting of creditors.

In compliance with Local Bankruptcy Rule 5071-1(d)(3)(C), notice of the Consent Motion shall be served on all parties on the matrix, the Trustee and the Office of the United States Trustee by first-class mail or CM/ECF, together with a notice of the new meeting and time of the Bankruptcy Code Section 341 Meeting of Creditors at least seven days in advance of the rescheduled meeting.

WHEREFORE, the Debtor(s) respectfully request(s) that this Court enter an order extending such deadlines as indicated above.

Respectfully submitted,

Date: 8/22/2025

By:/s/ Adam M. Freiman
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410-486-3500
Counsel to Debtor Brandon Chasen, Sr.

CONSENTED TO BY:

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I HEREBY CERTIFY that the terms of the copy of this consent order/stipulation submitted to the Court are identical to those set forth in the original consent order/stipulation; and the signatures represented by the /s/_____ on this copy reference the signatures of consenting parties on the original consent order/stipulation.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 22, 2025_, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the Consent Motion Pursuant to Local Bankruptcy Rule 5071-1(d) to Extend Deadlines as Condition for Postponement of Bankruptcy Rule Section 341 Meeting of Creditors will be served electronically by the Court's CM/ECF system on the following:

Joshua D. Bradley jbradley@rosenbergmartin.com,

Ifeigh@rosenbergmartin.com

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I HEREBY FURTHER CERTIFY that on the August 22, 2025 a copy of the Consent Motion Pursuant to Local Bankruptcy Rule 5071-1(d) to Extend Deadlines as Condition for Postponement of Bankruptcy Rule Section 341 Meeting of Creditors was also mailed first class mail, postage prepaid to:

All Parties to the attached mailing matrix. And

Office of the U.S. Trustee 101 W. Lombard Street, Suite 2625 Baltimore, MD 21201 Respectfully submitted,

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410-486-3500 Counsel to Debtor Brandon Chasen, S